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*Proposed Counsel to Debtors
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**TRIDENT HOLDING COMPANY, LLC, *et al.*,
Debtors.¹**

Chapter 11

Case No. 19-10384 (SHL)

(Jointly Administered)

**AGENDA OF MATTERS SCHEDULED FOR HEARING
ON MARCH 6, 2019 AT 2:00 P.M. (PREVAILING EASTERN TIME)**

Location of Hearing: Honorable Sean H. Lane, Courtroom 701, United States
Bankruptcy Court, Southern District of New York, One Bowling
Green, New York, NY 10004

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: Trident Holding Company, LLC (6396); American Diagnostics Services, Inc. (2771); Community Mobile Diagnostics, LLC (9341); Community Mobile Ultrasound, LLC (3818); Diagnostic Labs Holdings, LLC (8024); FC Pioneer Holding Company, LLC (6683); JLMD Manager, LLC (8470); Kan-Di-Ki LLC (6100); Main Street Clinical Laboratory, Inc. (0907); MDX-MDL Holdings, LLC (2605); MetroStat Clinical Laboratory – Austin, Inc. (4366); MX Holdings, LLC (8869); MX USA, LLC (4885); New Trident Holdcorp, Inc. (4913); Rely Radiology Holdings, LLC (3284); Schryver Medical Sales and Marketing, LLC (9620); Symphony Diagnostic Services No. 1, LLC (8980); Trident Clinical Services Holdings, Inc. (6262); Trident Clinical Services Holdings, LLC (1255); TridentUSA Foot Care Services LLC (3787); TridentUSA Mobile Clinical Services, LLC (0334); TridentUSA Mobile Infusion Services, LLC (5173); U.S. Lab & Radiology, Inc. (4988). The address of the Debtors' corporate headquarters is 930 Ridgebrook Road, 3rd Floor, Sparks, MD 21152.

Copies of Motions and
Applications:

Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, (ii) contacting the Office of the Clerk of the Court at United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, NY 10004, or (iii) from the Debtors' notice and claims agent, Epiq Corporate Restructuring, LLC, at <https://dm.epiq11.com/Trident> or by calling 1-800-960-1226. Note that a PACER password is needed to access documents on the Court's website.

I. STATUS CONFERENCE

A. Case Management Conference: Order Scheduling Initial Case Conference [Docket No. 108] (Date Filed: 2/26/19)

Status: This matter is going forward.

II. UNCONTESTED MATTERS

1. NOL Trading Motion: Debtors' Motion for Entry of Interim and Final Orders Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors [Docket No. 8] (Date Filed: 2/11/19)

Related
Documents:

- a. Interim Order Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors [Docket No. 47] (Date Filed: 2/12/19)
- b. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors [Docket No. 58] (Date Filed: 2/12/19)
- c. Notice of Interim Order Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors [Docket No. 104] (Date Filed: 2/25/19)
- d. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Motion for Entry of Interim and Final Orders Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors [Docket No. 124] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

2. **Cash Management Motion:** Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System, Bank Accounts, and Business Forms and Payment of Related Prepetition Obligations; (II) Modifying Certain Deposit Requirements; and (III) Authorizing Continuance of Intercompany Transactions and Honoring Certain Related Prepetition Obligations [Docket No. 9] (Date Filed: 2/11/19)

Related
Documents:

- a. Interim Order (I) Authorizing Continued Use of Existing Cash Management System, Bank Accounts, and Business Forms and Payment of Related Prepetition Obligations; (II) Modifying Certain Deposit Requirements; and (III) Authorizing Continuance of Intercompany Transactions and Honoring Certain Related Prepetition Obligations [Docket No. 37] (Date Filed: 2/12/19)
- b. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System, Bank Accounts, and Business Forms and Payment of Related Prepetition Obligations; (II) Modifying Certain Deposit Requirements; and (III) Authorizing Continuance of Intercompany Transactions and Honoring Certain Related Prepetition Obligations [Docket No. 52] (Date Filed: 2/12/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: This matter is going forward.

3. **Contract Assumption and Rejection Procedures:** Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Rejection of Certain Leases, (II) Authorizing and Approving Expedited Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Docket No. 19] (Date Filed: 2/11/19)

Related
Documents:

- a. Notice of Hearing Regarding Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Rejection of Certain Leases, (II) Authorizing and Approving Expedited Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Docket No. 60] (Date Filed: 2/12/19)
- b. Notice of Filing of Revised Proposed Order Granting Debtors Motion for Entry of an Order (I) Authorizing and Approving the Rejection of Certain Leases, (II) Authorizing and Approving Expedited Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Docket No. 111] (Date Filed: 2/27/19)
- c. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Rejection of Certain Leases, (II) Authorizing and Approving Expedited Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Docket No. 125] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

4. **De Minimis Sale Procedures:** Debtors' Motion for Order Under Bankruptcy Code Sections 105(a), 363, and 554 and Bankruptcy Rule 2002 Authorizing and Approving Procedures for the Sale, Transfer, or Abandonment of De Minimis Assets Free and Clear of Liens, Claims, Interests, and Encumbrances Without Further Order of Court [Docket No. 80] (Date Filed: 2/19/19)

Related
Documents:

- a. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Motion for Order Under Bankruptcy Code Sections 105(a), 363, and 554 and Bankruptcy Rule 2002 Authorizing and Approving Procedures for the Sale, Transfer, or Abandonment of De Minimis Assets Free and Clear of Liens, Claims, Interests, and Encumbrances Without Further Order of Court [Docket No. 126] (Date Filed: 3/1/19)

Objection
Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/
Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

5. **Tax Motion**: Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations [Docket No. 11] (Date Filed: 2/11/19)

Related
Documents:

- a. Interim Order Authorizing Debtors to Pay Certain Pre-Petition Taxes and Related Obligations [Docket No. 43] (Date Filed: 2/12/19)
- b. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations [Docket No. 54] (Date Filed: 2/12/19)
- c. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations [Docket No. 127] (Date Filed: 3/1/19)

Objection
Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/
Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

6. **Insurance Motion:** Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to (I) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder; (II) Continue to Honor Premium Financing Obligations; and (III) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies and Insurance Premium Financing Agreements [Docket No. 12] (Date Filed: 2/11/19)

Related
Documents:

- a. Interim Order Authorizing Debtors to (I) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder; (II) Continue to Honor Premium Financing Obligations; and (III) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies and Insurance Premium Financing Agreements [Docket No. 44] (Date Filed: 2/12/19)
- b. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to (I) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder; (II) Continue to Honor Premium Financing Obligations; and (III) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies and Insurance Premium Financing Agreements [Docket No. 55] (Date Filed: 2/12/19)
- c. Certificate of No Objection Pursuant to Local Rule 9075-2 Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to (I) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder; (II) Continue to Honor Premium Financing Obligations; and (III) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies and Insurance Premium Financing Agreements [Docket No. 128] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

7. **Critical Vendor Motion:** Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors, Shippers, and Service Providers; (II) Authorizing Provisional Payment to Certain Contract Counterparties; and (III) Granting Related Relief [Docket No. 14] (Date Filed: 2/11/19)

Related
Documents:

- a. Interim Order (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors, Shippers, and Service Providers; (II) Authorizing Provisional Payment to Certain Contract Counterparties; and (III) Granting Related Relief [Docket No. 45] (Date Filed: 2/12/19)
- b. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors, Shippers, and Service Providers; (II) Authorizing Provisional Payment to Certain Contract Counterparties; and (III) Granting Related Relief [Docket No. 56] (Date Filed: 2/12/19)
- c. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors, Shippers, and Service Providers; (II) Authorizing Provisional Payment to Certain Contract Counterparties; and (III) Granting Related Relief [Docket No. 129] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

8. **Customer Programs Motion:** Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Honor Certain Prepetition Obligations to Payors and to Continue Customer Programs [Docket No. 15] (Date Filed: 2/11/19)

Related
Documents:

- a. Interim Order Authorizing Debtors to Honor Certain Pre-Petition Obligations to Payors and to Continue Customer Programs [Docket No. 46] (Date Filed: 2/12/19)
- b. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors' to Honor Certain Prepetition Obligations to Payors and to Continue Customer Programs [Docket No. 57] (Date Filed: 2/12/19)
- c. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Honor Certain Prepetition Obligations to Payors and to Continue Customer Programs [Docket No. 130] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

9. **Interim Compensation:** Debtors' Motion for Entry of an Order Pursuant to Bankruptcy Code Sections 105(a) and 331, Bankruptcy Rule 2016, and Local Bankruptcy Rule 2016-1 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 71] (Date Filed: 2/15/19)

Related

Documents:

- a. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Motion for Entry of an Order Pursuant to Bankruptcy Code Sections 105(a) and 331, Bankruptcy Rule 2016, and Local Bankruptcy Rule 2016-1 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 132] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

10. **Ordinary Course Professional Motion:** Debtors' Motion for Entry of Order Authorizing Debtors to Employ and Pay Professionals Utilized in the Ordinary Course of Business [Docket No. 82] (Date Filed: 2/19/19)

Related
Documents:

- a. Certificate of no Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Motion for Entry of Order Authorizing Debtors to Employ and Pay Professionals Utilized in the Ordinary Course of Business [Docket No. 133] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

11. **Utilities Motion:** Debtors' Motion for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Companies; and (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service [Docket No. 13] (Date Filed: 2/11/19)

Related
Documents:

- a. Notice of Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Approving Debtors Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Companies; and (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service [Docket No. 59] (Date Filed: 2/12/19)

- b. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Companies; and (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service [Docket No. 135] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

- 12. **Togut Retention:** Debtors' Application for Order Pursuant to Bankruptcy Code Sections 327(a) and 328 Authorizing the Employment and Retention of Togut, Segal & Segal LLP as Co-Counsel to the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [Docket No. 94] (Date Filed: 2/19/19)

Related

Documents:

- a. Supplemental Declaration of Frank A. Oswald in Support of Debtors' Application for Order Pursuant to Bankruptcy Code Sections 327(a) and 328 Authorizing the Employment and Retention of Togut, Segal & Segal LLP as Co-Counsel to the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [Docket No. 118] (Date Filed: 2/28/19)
- b. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Application for Order Pursuant to Bankruptcy Code Sections 327(a) and 328 Authorizing the Employment and Retention of Togut, Segal & Segal LLP as Co-Counsel to the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [Docket No. 131] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this application may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the application have been received, or that all such objections or responses have been resolved.

13. **Epiq Retention:** Debtors' Application for Entry of an Order Authorizing Employment and Retention of Epiq Corporate Restructuring, LLC as Administrative Agent to the Debtors Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 95] (Date Filed: 2/19/19)

Related
Documents:

- a. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Application for Entry of an Order Authorizing Employment and Retention of Epiq Corporate Restructuring, LLC as Administrative Agent to the Debtors Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 137] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this application may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the application have been received, or that all such objections or responses have been resolved.

14. **Ankura Retention:** Debtors' Application for Entry of an Order (I) Authorizing Employment and Retention of Ankura Consulting Group, LLC as Financial Advisor to the Debtors' Effective *Nunc Pro Tunc* to the Petition Date and (II) Granting Related Relief [Docket No. 96] (Date Filed: 2/19/19)

Related
Documents:

- a. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Application for Entry of an Order (I) Authorizing Employment and Retention of Ankura Consulting Group, LLC as Financial Advisor to the Debtors' Effective *Nunc Pro Tunc* to the Petition Date and (II) Granting Related Relief [Docket No. 138] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this application may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the application have been received, or that all such objections or responses have been resolved.

15. **PJT Retention:** Debtors' Application for Entry of an Order (I) Authorizing Employment and Retention of PJT Partners LP as Investment Banker for the Debtors' Effective *Nunc Pro Tunc* to the Petition Date, (II) Exempting PJT from Certain Time-Keeping Requirements, and (III) Granting Related Relief [Docket No. 96] (Date Filed: 2/19/19)

Related

Documents:

- a. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Application for Entry of an Order (I) Authorizing Employment and Retention of PJT Partners LP as Investment Banker for the Debtors' Effective *Nunc Pro Tunc* to the Petition Date, (II) Exempting PJT from Certain Time-Keeping Requirements, and (III) Granting Related Relief [Docket No. 134] (Date Filed: 3/1/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this application may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the application have been received, or that all such objections or responses have been resolved.

16. **Skadden Retention:** Debtors' Application for Order Authorizing Employment and Retention of Skadden, Arps, Slate, Meagher & Flom LLP as Counsel to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 93] (Date Filed: 2/19/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/
Responses Filed: None.

Status: This matter is going forward.

III. CONTESTED MATTERS

17. **DIP Financing Motion:** Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 16] (Date Filed: 2/11/19)

Related
Documents:

- a. Notice of Filing of (I) Schedule 6.18 and (II) Schedule 6.20 to the DIP Credit Agreement [Docket No. 26] (Date Filed: 2/11/19)
- b. Interim Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing, (B) to Utilize Cash Collateral, (II) Granting Adequate Protection to Secured Parties, and (III) Scheduling a Final Hearing [Docket No. 41] (Date Filed: 2/12/19)
- c. Notice of Entry of Interim Order and Final Hearing regarding Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors' to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 53] (Date Filed: 2/12/19)
- d. Notice Of Filing Of Proposed Final Order (I) Authorizing Debtors (A) To Obtain Postpetition Financing Pursuant To 11 U.S.C. §§ 105, 361, 362, 363, And 364 And (B) To Utilize Cash Collateral Pursuant To 11 U.S.C. § 363, And (II) Granting Adequate Protection To Prepetition Secured Parties Pursuant To 11 U.S.C. §§ 361, 362, 363, 364 And 507(b) [Docket No. 143] (Date Filed: 3/3/19)

Objection
Deadline: February 28, 2019 at 4:00 p.m. (Prevailing Eastern Time).

Objections/
Responses Filed:

- e. Reservation of Rights of the Official Committee of Unsecured Creditors to Debtors' Motion for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and 364 and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. § 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) [Docket No. 136] (Date Filed: 3/1/19)

Status: This matter is going forward. The Debtors are in discussions to resolve comments received to the DIP order.

18. **Employee Motion:** Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Obligations and (B) Continue Employee Benefit Programs and (II) Granting Related Relief [Docket No. 10] (Date Filed: 2/11/19)

Related
Documents:

- a. Interim Order (I) Authorizing, But Not Directing, the Debtors to (A) Pay Certain Pre-Petition Employee Obligations and (B) Continue Employee Benefit Programs and (II) Granting Related Relief [Docket No. 63] (Date Filed: 2/13/19)
- b. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Obligations and (B) Continue Employee Benefit Programs and (II) Granting Related Relief [Docket No. 64] (Date Filed: 2/13/19)

Objection

Deadline: February 27, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/
Responses Filed:

- c. Objection of the United States Trustee to Motion of Debtors for Entry of a Final Order Authorizing, but not Directing, the Debtors to (A) Pay Certain Prepetition Employee Obligations and (B) Continue Employee Benefit Programs and (II) Granting Related Relief [Docket No. 110] (Date Filed: 2/27/19)

- d. Debtors' Reply To Objection Of The United States Trustee To Motion Of Debtors For Entry Of A Final Order Authorizing, But Not Directing, The Debtors To (A) Pay Certain Prepetition Employee Obligations And (B) Continue Employee Benefit Programs And (li) Granting Related Relief [Docket No. 142]
(Date Filed: 3/1/19)

Status: This matter is going forward.

Dated: March 4, 2019
New York, New York

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Jason N. Kestecher

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Proposed Counsel to Debtors and Debtors-in-Possession